



ASDSE  
20.2.4.4 VI

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February 15, 2008

**RECEIVED**

FEB 20 2008

**Environmental  
Cleanup Office**

Mr. Kevin L. Rochlin  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, ECL-111  
Seattle, WA 98101

RE: Monthly Report: No. 140, January 2008  
Operable Unit No. 02  
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill  
Site Manager

Attachment (2 copies)

cc: Chung Ki Yee - Washington Department of Ecology  
Evan Griffiths - CH2MHill (2 copies)  
Richard Kauffman - ATSDR c/o U.S. EPA Region 10  
Leslie Ann Rose - Citizens for a Healthy Bay

**USEPA SF**



**1332501**

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*A. Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in January.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

*B. Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,050 gallons of leachate (10.8 ppm results attached) on January 4, 2007.

*C. Work Plans and other deliverables completed and submitted during the previous month.*

1. The revised Point Ruston Remediation Design was submitted to EPA on January 31, 2008.
2. No comments were received from EPA during the month of January.
3. Remedial Action during January included the following tasks:
  - OCF construction activities:
    - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
  - Stack Hill construction activities:
    - Maintained erosion and surface water controls

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- Continued development activities with installation of sanitary and storm systems
- Hauled utility trench soils to lower site for use as cap materials
- Site-wide remediation activities:
  - Continued surface water controls
  - Maintained haul roads and stockpiles onsite
  - Maintained erosion and surface water controls

*D. Actions scheduled for the next six weeks.*

1. Point Ruston anticipates comments on the Stack Hill Institutional Control Plan submitted to EPA on December 20, 2007.
2. Point Ruston anticipates comments on the Sediment Capping Project – Final Construction Monitoring/As-Built Report submitted to EPA on December 31, 2007.
3. Point Ruston anticipates comments on the revised Remediation Design submitted to EPA on January 31, 2008.
- 4.
5. The following Remedial Action tasks are planned to continue:
  - RA Monitoring:
    - Outfall sampling (weekly composite samples) during scheduled months
    - Air monitoring during remedial action activities
  - OCF construction activities:
    - Continue collection of leachate for offsite disposal
    - Continue monitoring of leachate volumes
  - Stack Hill construction activities:
    - Erosion controls and site maintenance
  - Site-wide construction activities:
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    - Maintain roads and stockpiles onsite
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*E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.*

1. Point Ruston is completing permitting for the first phase of development on the lower site with the City of Tacoma.

*F. Modifications to work plans or schedules proposed to or approved by EPA.*

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.

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G. *Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.*

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1<sup>st</sup> and 3<sup>rd</sup> Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.



ENERGY LABORATORIES, INC. \* 1120 S 27th St \* PO Box 30916 \* Billings, MT 59107-0916  
Toll Free 800.735.4489 \* 406.252.6325 \* FAX 406.252.6069 \* eli@energylab.com

## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** OCF Leachate  
**Lab ID:** B07121770-001  
**Client Sample ID:** TSM120720

**Report Date:** 01/03/08  
**Collection Date:** 12/20/07 13:45  
**Date Received:** 12/24/07  
**Matrix:**

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	10.8	mg/L		0.1		E200.7	01/02/08 17:25 / jjw

**Report Definitions:** RL - Analyte reporting limit.  
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[http://www.ecy.wa.gov/programs/tcp/sites/tacoma\\_smelter/ts\\_hp.htm](http://www.ecy.wa.gov/programs/tcp/sites/tacoma_smelter/ts_hp.htm)

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# APPENDIX E

## TACOMA SMELTER PLUME GENERAL TIMELINE

This timeline depicts the major stages, or *implementation steps*, of the Tacoma Smelter Plume project and the timeframe for completion. The steps are divided into three groups based on the objective:

- Objective 1 – Improve Public Awareness;
- Objective 2 – Characterize Soils and Implement Protective Measures; and
- Objective 3 – Improve Institutional Capabilities.

(Please refer to sections 3.2, 4.2, and 5.2 for more detail on the implementation steps.)



## APPENDIX E: TSP GENERAL TIMELINE

### IMPLEMENTATION STEPS BY OBJECTIVE

#### OBJECTIVE 1: IMPROVE PUBLIC AWARENESS

	2005	2006	2007	2008	2009	2010	2020
1 Develop and implement public awareness campaigns	Ongoing						
2 Maintain websites	Ongoing						
3 Develop soil sampling and other guidance brochures							
4 Sustain/strengthen existing and new partnerships with agencies, orgs	Ongoing						
5 Develop partnerships- non-English; financially disadvantaged		Ongoing					
6 Initial contact with State Superintendent (OSPI), school districts							
7 Work with schools districts; schools: materials & training	Ongoing						
8 Work with Dept. of Early Learning (DEL), childcare organizations			Ongoing				
9 Work with childcares, develop and share materials and training	Ongoing						
10 Address soil contamination: parks, camps; multi-family housing							
11 Conduct residential soil sampling/Home Env. Assessment List (HEAL)							

#### OBJECTIVE 2: CHARACTERIZE SOILS AND IMPLEMENT PROTECTIVE MEASURES

	2005	2006	2007	2008	2009	2010	2020
1 Develop and implement Soil Safety Program: schools & childcares							
2 Distribute soil sampling and protective measures brochures							
3 Follow-up with previously sampled child use properties:							
4 Inventory existing parks, camps; multi-family house							
5 Develop guidance brochures: properties under development							
6 Provide technical assistance/characterization for property owners	Ongoing						

#### OBJECTIVE 3: IMPROVE INSTITUTIONAL CAPABILITIES

	2005	2006	2007	2008	2009	2010	2020
1 Ecology improve technical assistance and SEPA review processes							
2 Public Health incorporate message: -nurses; school safety staff							
3 Incorporate soil contamination issues: educational facility operations							
4 Incorporate soil contamination message: curriculums; training							
5 Childcare organizations- institutionalize soil contamination concerns							
6 Local land use planning and development policies and processes							
7 Local-state agencies: new construction; maintenance; reconstruction							
8 Realtors and other land transaction professionals							
9 Federal and other government coordination							
10 Other state agency grants: local planning; solid waste							